

REMARKS

The original claims have been rewritten as pending claims 27-36. Claims 1-26 have been cancelled without prejudice or disclaimer.

No new subject matter has been added to the application.

Claims 22-26 were rejected under 35 U.S.C. §101. This rejection is respectfully traversed by the amendments to the claims. Specifically, new claims 35-36 are directed towards a computer readable medium.

Claims 1-2, 14-15, 18, 20 and 22-24 were rejected under 35 U.S.C. §103(a) over Delabastita (US 5,766,807) in view of Samworth (US 6,118,935). Claims 3-13, 16-17, 19, 21 and 25-26 were rejected under 35 U.S.C. §103(a) over Delabastita (US 5,766,807) and Deschuytere (EP 0642259) in view of Samworth (US 6,118,935). These rejections are respectfully traversed as follows.

In determining a prima facie case for obviousness under 35 U.S.C. §103, it is necessary to show that the combination of prior art teachings is proper, and that those teachings are sufficient to suggest making the claimed modifications to one of ordinary skill in the art.

According to independent claim 27, three subsequent ranges of densities in an image can be identified:

- sub-range 1: in a first (highlight) density D0-D1, FM screening is used of (black) dots having a first (small) size;
- sub-range 2: in a second density range D1-D2, AM screening is used to let the (black) dots grow from their first (small) size to a second (larger) size;
- sub-range 3: in a third (mid-tone) density range D2-D3, again FM screening is used of these (larger black) dots.

The applicant agrees with the examiner that Delabastita '807 discloses the use of FM screening in a first sub-range (Delabastita, FIG. 2a) and AM screening in a second sub-range (Delabastita FIG. 2c).

*The use of FM screening in a third sub-range of densities, which includes the mid-tones (see FIG. 3), however, is specifically is not disclosed in any of the prior art documents.*

On the contrary, Delabastita teaches (column 2, lines 59-60) that "Especially in the fixed sized halftone dots exhibit a larger total circumference than the halftone dots in a periodic (AM) screen and are therefore more sensitive to variations in size during the various stages of the reproduction process". Delabastita clearly *teaches a person skilled in the art away from* the solution of pending claim 27. Hence, there is no suggestion or motivation for one skilled in the art to combine the teachings of Delabastita (which uses FM only in the highlights) with the teachings of one of the many applied or cited documents (e.g. Yu) in which FM screening is used in the mid-tones. It would therefore not have been obvious to a person skilled in the art to come to the invention disclosed in the current application at the time of the invention.

The same arguments above apply to independent claim 29. It is thus believed that independent claims 27 and 29 and all other claims dependent thereon are patentable over the prior art cited.

The correct spelling of the sole inventor's name is RUDOLF BARTELS. His nickname is Rudi which was inadvertently submitted on some of the paperwork. The inventor, who lives in Belgium, is in the process of preparing a Supplemental Declaration to be filed upon completion with his name spelled correctly.

The prior art made of record and not relied upon has been reviewed but is not considered material to the patentability of the invention.

This is a general authorization to charge the one-month extension fee and any other fees due to Deposit Account No. 13-3377. Please find attached the Petition for a One-Month Extension of Time Under 37 CFR 1.136 (a).

It should be noted that the above arguments are directed towards certain patentable distinctions between the claims and the prior art cited. However, the patentable distinctions between the pending claims and the prior art cited are not necessarily limited to those discussed above.

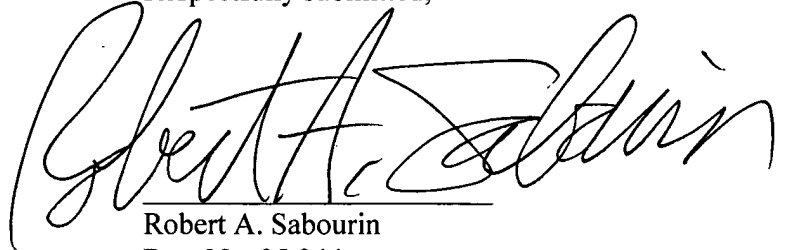
In view of the foregoing remarks and amendments, it is respectfully submitted that each rejection of the Office Action has been addressed and overcome so that this application is now in condition for allowance. The Examiner is respectfully requested to reconsider the

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questions arise during examination, the Examiner is welcome to contact the applicant's attorney as listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert A. Sabourin", written over a horizontal line.

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